

Salford Core Strategy Examination

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26 September 2012

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Dear Mr Findley

1. Now that we have discussed such matters as Strategy, Housing and Economic Development at the Hearings, and I have undertaken a number of site inspections, I am able to set out some draft preliminary conclusions on the evidence heard and seen so far. I have also taken account of the National Planning Policy Framework (the Framework).

2. I remain concerned about the amount of housing which the Core Strategy proposes, and you will recall my letter to you of 30 July 2012 before the Hearings started. For the present, the Regional Strategy (RS) remains part of the development plan for the City. I acknowledge that it sets an overall strategy rather than being in the form of a series of tests or criteria against which policies and proposals should be tested. Housing is an important, indeed vital, part of the Regional Strategy, and of course its importance is reinforced in the Framework and recent Ministerial pronouncements.

3. The Ministerial Statement of 23 March 2012 refers to the pressing need to ensure that the planning system does everything it can to help secure a swift return to economic growth and urges local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas. The Framework urges local planning authorities to boost significantly the supply of housing, and in his Written Statement of 6 September 2012 the Secretary of State noted the increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth. As has been accepted at the Hearings, house building is a driver of the local economy besides providing homes for local people. The evidence presented to me supports an annual housing requirement of at least 1,600 dwellings instead of the current proposed annual provision of at least 1,300 dwellings. In addition to reflecting an objective assessment of need in accordance with the Framework requirement, this would be likely to bring forward more affordable and aspirational homes to which reference has been made at the Hearings, a considerable benefit.

4. In my judgement, the Core Strategy is unsound in its present form in that it does not demonstrate an adequate and realistically deliverable supply of housing land and I do not, at present, have the information to recommend main modifications to make the plan sound. This additional requirement will mean the identification of more opportunities for house building. I would ask you to give further consideration to the urban parts of the City, assessing for example any additional opportunities for the redevelopment of land in the Regional Centre

and the rest of Central Salford including Ordsall and Pendleton and the more urban parts of Salford West such as Eccles, Swinton and Pendlebury. Higher densities may also assist, although maybe to a limited extent. Other parts of Salford West may be called upon to contribute to housing requirements, including Worsley and Boothstown. Whether or not you also choose to reconsider the Green Belt land at Hazelhurst is entirely a matter for you.

5. Depending upon the amount of development proposed in these parts of the City, I do not consider that this approach would undermine Policy SF1 Regional Centre which seeks to deliver very high levels of investment and development, strengthening the role of the whole Regional Centre as the major focus for business, retail, leisure, cultural and tourism development in Greater Manchester. Nor need it undermine its intention to secure a very significant expansion of the residential population, with a total net increase of around 10,000 dwellings predominantly in the form of apartments but with some houses in the less central areas. It need not undermine RS Policy RDF1, the cornerstone of the RS, which states that the first priority for growth and development should be the regional centres of Manchester and Liverpool and that the second priority should be the inner areas surrounding these regional centres. Nor should it frustrate the emphasis to be placed on areas in need of regeneration and Housing Market Renewal Areas in particular. These approaches and priorities appear to me to be complementary.

6. Maybe one or more broad locations should be identified with indicative amounts of housing specified for it/them. This would provide a firm basis for clearly demonstrating, in the Core Strategy, provision for 5 years worth of housing and additional sites or broad locations for years 6-10 and, where possible, for years 11-15, in accordance with the Framework paragraph 47. On this point, I note that net housing completions since the start date of the RS have met the annual requirement of 1,600 net completions in only one year, 2007-2008, when 2,468 were achieved. Otherwise, there has been an often substantial shortfall, with only 381, 477, 455 and 148 net completions in 2005-2006, 2009-2010, 2010-2011 and 2011-2012 respectively. Reasons for this may include a shortage of sites attractive to prospective developers and the shortage of mortgage finance. Nevertheless, this appears to me to constitute a persistent under-delivery of housing and this calls for the buffer of 20% to which the aforementioned paragraph 47 refers.

7. I agree that there should be policies concerned with the size of dwellings and the provision of amenity space in residential development (Policies H5 and H6) in that they amplify at the local level the policy in the Framework that good design is indivisible from good planning and should contribute positively to making places better for people. I do, however, think that these policies are somewhat over-prescriptive at present, may thwart much needed housing development and should be re-assessed. Further consultation with the house building industry may assist.

8. Salford will undoubtedly play a major role in the economic growth of the Manchester City Region during the plan period, and appropriate provision should be made for it, including for industrial and warehousing space. I must therefore ask you to reconsider the Economic Development policies. Of particular concern is the emphasis on past trends to suggest the demand for new accommodation, although I note the point in the Core Strategy that it should be possible to deliver around 350,000 sq m of industrial and warehousing space, rather than the 300,000 sq m based upon these trends, during the plan period. It can often be useful to look at past trends, but the Final Report of the Employment Land Review (November 2008) draws attention to, for example, the general need to improve the quality of Salford's industrial supply to meet modern needs and it notes that many of its older estates are unsuited to these needs. I therefore suspect that previous take-up rates have been governed to some extent by

an insufficient amount of sites attractive to prospective developers, and that this emphasis on past trends could deny the City the opportunities for growth which it and its people need. I would suggest a re-assessment of the requirement and a spelling out in the Core Strategy of its implications. Maybe the identification of one or more broad locations for industrial and warehousing floorspace is the way forward.

9. The Core Strategy estimates that there will be a net loss of around 55,000 sq m of industrial and warehousing floorspace during the plan period, and it is upon such losses that the supply of a substantial amount of housing land depends. Such a supply seems to me to be too uncertain. There can be no guarantee that it will come forward in sufficient quantities, even if that were consistent with policies to protect such land, and there can be no guarantee that it will come forward in the right places, at the right time or be suitable in all other respects for housing. I am not convinced about the soundness of the Core Strategy in these respects.

10. It will be for the Council to decide the best way forward. Having regard to the need to avoid abortive costs to the authority, I propose to suspend the Hearings until further notice. There would be little point in continuing with further Hearings before your Council has had an opportunity to address the soundness issues raised. I have come to this conclusion with considerable reluctance, because I realise that you and your team have spent a good deal of time on the Core Strategy so far, and that rightly you want to have it adopted as soon as possible. Unfortunately, a suspension does not guarantee that I will eventually conclude that the submitted plan can be modified to overcome matters of housing, economic development or any other considerations.

11. I should be grateful if you would let me know your intentions as soon as possible, with a programme of key dates during the suspension comparable with that produced by Wigan Council. Should any significant delays occur, please let me know. In the meantime, I will not be undertaking any preliminary drafting of my Report, simply because of the potential impact of modifications regarding housing and employment land supply on the spatial strategy and other policies in general. For the same reason, it would be inappropriate, serving little or no benefit, to publish a partial report or consult on some proposed modifications without taking account of the wider context.

12. I have asked the Programme Officer to furnish all participants at the Hearings with a copy of this letter, and to put it on the Examination webpages.

Yours sincerely

Richard E Hollox

Examination Inspector